



7373 Gateway Boulevard  
Newark  
California  
CA94536

Mr David Hurlin  
Environmental Protection Agency  
Compliance Division  
Light-Duty Vehicle Center  
2000 Traverwood Drive  
Ann Arbor, MI 48105

6 February 2020

Dear Mr. Hurlin

**Testing exemption request under 40 CFR § 85.1705**

I am writing on behalf of Lucid Motors USA Inc, the doing business name of Atieva Inc. with whom you've had correspondence before.

Lucid Motors are currently working on our

**Ex. 4 CBI**

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In order to use these Beta 1 vehicles for research, development and demonstration purposes, we are applying for a testing exemption in accordance with 40 CFR, Part 85, section 1705.

**Make, Model, Year and Location of Production**

The vehicles in question are Lucid Air sedan prototypes, manufactured in 2019 in California. Hence, they are domestically-produced vehicles.

**Purpose of Beta 1 vehicles**

The purpose of the Beta 1 vehicles is

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**Description of need for exemption**

As Lucid Motors currently have no vehicles

**Ex. 4 CBI**

# Ex. 4 CBI

**Test Program Scope**

It is estimated that the Beta 1 vehicles will be used for up to 1 year, although some vehicles may be kept as reference vehicles and used for a longer period. In this case, Lucid Motors will re-apply for exemptions for those specific vehicles before the expiry of the exemption period.

Records regarding the purposes of testing, test sites, and duration of tests for each vehicle will be recorded by Lucid Motors fleet manager and made available for EPA inspection on request.

**Description of vehicles**

Lucid Motor vehicles are all fully electric and therefore no emissions control equipment is required or fitted. A list of all vehicle identification numbers and use for the Beta 1 fleet is below:

<b>Ex. 6 Personal Privacy (PP)</b>	Powertrain controls development
	Marketing
	Vehicle Dynamics
	Electrical Integration
	Vehicle Dynamics
	Marketing
	Marketing
	NVH
	Powertrain controls development
	Vehicle Dynamics
	Thermal
	ADAS/AD development
	Vehicle Dynamics
	ADAS/AD development

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	Durability
	Electrical Integration
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	Durability
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	ADAS/AD development
	Vehicle Integration
	Marketing

Each vehicle is wholly owned by Lucid Motors, though some vehicles may, in some cases, be operated by suppliers contracted by Lucid Motors.

**Requested duration of exemption and final disposition of vehicles**

Lucid Motors requests that a one-year exemption be granted as soon as possible.

As we approach the end of that period, we will either apply for an extension to this exemption or dispose of the vehicles in a manner according with EPA policies.

Thank you in advance for your prompt attention to this matter. If you should have any questions regarding this request, please contact me as soon as possible.

Yours sincerely

**Ex. 6 Personal Privacy (PP)**

Head of Global Homologation

**Ex. 6 Personal Privacy (PP)**